



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

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October 17, 2001

Reply To
Attn Of: ECL-115

MEMORANDUM

SUBJECT: Hillman Properties
EPA Site ID No. WAD980979751

FROM: Monica Tonel, Superfund Program
Office of Environmental Cleanup (ECL)

Monica Tonel

Judy Stone, Resource Conservation and Recovery Act Program
Office of Waste & Chemicals Management (WCM)

Judy Stone

TO: Official CERCLA and RCRA site files

BACKGROUND

On March 31, 1999, the Office of Inspector General (OIG) released an audit report entitled "Superfund Sites Deferred to RCRA," which assessed EPA's implementation of its Resource Conservation and Recovery Act (RCRA) deferral policy. The OIG concluded that a large portion of the sites deferred to RCRA did not meet the deferral criteria and were therefore inappropriately deferred. The above subject site has been identified as one of those "deferred" sites requiring a review of the deferral decision.

PURPOSE

This memorandum is written in reference to the interim guidance provided by EPA Headquarters, OSWER Directive 9200.1-31P, and serves to:

- clarify the current status of the above subject site in both the Superfund and RCRA programs,
- identify the program that will maintain responsibility for the site, and
- clarify any changes to the CERCLIS database resulting from this review.

EPA has conducted a review of available information and determined that the subject site should not be deferred to RCRA. Additionally, no further assessment/action under the federal Superfund program is anticipated, at this time. Should new or additional information become available warranting further Superfund consideration, this site will be reevaluated at that time.

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RCRA program, current status. In 1990 a Facility Assessment was done on this site. It was ranked Low priority for corrective action, and it was determined that no Facility Investigation was necessary.

SF tracking/CERCLIS database. The action qualifier of "D" in CERCLIS, associated with a Preliminary Assessment completed in 1990 will be changed to "No Further Remedial Action Planned" (NFRAP). The Non-NPL Status field in CERCLIS will reflect a "NFRAP" value. The RCRA Deferral Audit Special Initiative Indicator will reflect a "RCRA Deferral-New Decision" value. This memorandum documents the reasons for the change.

Additionally, in accordance with EPA's decision regarding the tracking of sites for which no further work under the federal Superfund program is planned at this time, the subject site was removed from the CERCLIS database and placed in a separate archival data base as a historical record. Archived sites may be returned to the CERCLIS site inventory if new information warranting further Superfund consideration is discovered.